

FILED

AUG 10 2022

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) **4:22-CR-00448-HEA/SRW**
)
JESSICA MEDRANO,)
)
Defendant.)

INDICTMENT

The Grand Jury charges:

COUNT 1

(Aggravated Identity Theft)

On or about December 19, 2021, in the Eastern District of Missouri, the defendant,

JESSICA MEDRANO,

did knowingly possess, transfer, and use, without lawful authority, the means of identification of another person, to wit, the name, date of birth, and account number of K.M., during and in relation to the commission of the felony offense of fraudulently effecting transactions, Title 18, United States Code, Section 1029(a)(5), knowing that the means of identification belonged to an actual person.

In violation of Title 18, United States Code, Section 1028A.

COUNT 2

(Fraudulently Effecting Transactions)

Between on or about January 21, 2022, and on or about May 16, 2022, in the Eastern District of Missouri, the defendant,

JESSICA MEDRANO,

in a matter effecting interstate commerce, did knowingly and with intent to defraud, effected transactions with Wal-Mart in an aggregate amount of \$1,000 or more, that being \$12,668.47, through an access device, to wit: a debit card account number issued to K.M.

In violation of Title 18, United States Code, Section 1029(a)(5).

COUNTS 3 THROUGH 14

(Wire Fraud)

A. The Scheme to Defraud

1. Beginning on or about January 24, 2022, and continuing through on or about May 16, 2022, in the Eastern District of Missouri and elsewhere, the defendant,

JESSICA MEDERNO,

devised, and intended to devise, a scheme and artifice to obtain money and to defraud K.M., First State Bank, and Cash App by means of materially false statements and representations, to wit, by fraudulently using the identifying information of K.M. to electronically transfer funds from K.M.'s First State Bank account to Defendant's Cash App account without K.M.'s authorization.

2. It was part of the scheme and artifice to defraud and to obtain money and property that:

- a. On a date prior to January 24, 2022, Defendant created a Cash App account;
- b. On a date prior to January 24, 2022, Defendant obtained the First State Bank debit card account number of her elderly and disabled uncle K.M.;
- c. Beginning on or about January 24, 2022, Defendant added money to her Cash App balance by electronically transferring funds from K.M.'s First State Bank account;
- d. Between on or about January 24, 2022, and on or about June 6, 2022, Defendant electronically transferred more than \$54,000 to her Cash App balance from K.M.'s First State Bank account.

B. The Wire Transmissions

3. On or about the dates listed below, in the Eastern District of Missouri and elsewhere, the defendant,

JESSICA MEDRANO,

for the purpose of executing the above-described scheme to defraud, did cause to be transmitted, by means of interstate wire transmissions to Cash App's servers which are located outside the Eastern District of Missouri, certain writings, signs, signals, pictures, and sounds, to include the electronic transfer of funds to her Cash App balance:

COUNT	DATE	AMOUNT
3	January 28, 2022	\$750
4	January 31, 2022	\$750
5	February 7, 2022	\$500
6	February 7, 2022	\$500
7	February 8, 2022	\$750
8	February 9, 2022	\$500
9	February 28, 2022	\$2,500
10	May 17, 2022	\$500

COUNT	DATE	AMOUNT
11	May 17, 2022	\$1,000
12	May 17, 2022	\$1,000
13	May 23, 2022	\$1,000
14	May 23, 2022	\$1,000

In violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 1028A and 1029(a)(5), as set forth in Counts 1 and 2, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said offense. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

2. Pursuant to Title 18, United States Code, Sections 982(a)(7), upon conviction of an offense of Title 18, United States Code, Section 1343, as set forth in Counts 3 through 14, the defendant shall forfeit to the United States of America any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

3. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

TRACY L. BERRY, 014753 TN
Assistant United States Attorney